IN THE DRAWINGS

In FIG. 1, please change the text "122 ENABLERS" to "121 ENABLERS".

In FIG. 2 at block 200, please change the text "MANAGEMENT SERVER" to "MODULE SERVER".

In FIG. 2 at block 201, please change the text "MODULE SEVER" to "MODULE SERVER".

Marked-up copies of FIGs. 1 and 2, including annotations indicating the above changes are included herewith. In addition, replacement sheets for FIGs. 1 and 2 that incorporate the above changes are included herewith.

REMARKS

This Amendment is being filed in response to the Office Action mailed on December 4, 2006. Reconsideration and further examination of the Application is hereby requested.

Claims 1-28 are currently pending in the Application.

Claims 1, 14, 27 and 28 have been amended.

Amendments to the Specification

In the specification, the paragraphs at page 7, lines 20-30; page 14, line 21 to page 15, line 13; page 15, lines 14-30; page 28, lines 11-20; page 29, line 12 to page 30, line 7; page 31, lines 5-7; and page 31, lines 8-10 have been amended to correct various typographical errors. No new matter has been added with these amendments.

Amendments to the Drawings

FIGs. 1 and 2 have been amended to correct various typographical errors and make the drawings conform to the specification. No new matter has been added with these amendments.

§ 112 Rejections

In the Office Action, claims 1-28 were rejected under 35 U.S.C. § 112 as lacking an antecedent basis for "the management server." Claims 1, 14, 27 and 28 have been amended to replace "the management server" with "the module server".

The Applicants believe these amendments overcome the above § 112 rejections and therefore respectfully request that the above rejections to claims 1-28 be withdrawn.

§ 102 Rejections

In the Office Action, claims 1-28 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent Number 6,539,422 to Hunt *et. al.*, hereinafter "Hunt".

Brief Description of the Cited Art

Hunt describes a technique for controlling automatic data collection (ADC) device platforms. The technique involves a system comprising a network controller, a remote computer and one or more ADC device platforms. The ADC device platforms are configured to collect data using ADC devices. The ADC devices include bar code readers, radio frequency (RF) tag readers and magnetic strip readers which collect data by reading bar codes, RF tags, magnetic strips, respectively. Data collected by the ADC devices is transferred to the remote computer. See Hunt, column 4, line 40 to column 5, line 3.

The network controller communicates with the remote computer and the ADC device platforms. This communication includes querying the ADC device platforms to determine which ADC device platforms are on the network and providing system status of the ADC device platforms to the remote computer. The network controller may also communicate directly with the ADC device platforms to alter device parameter settings on the platforms. See Hunt, column 5, lines 4-13 and column 12, lines 26-40 and column 13, lines 1-17.

The remote computer enables a system administrator to manage the ADC device platforms. Management is performed using Java applets which run in a browser at the remote computer. The Java applets issue various Simple Network Management (SNMP) "set" and "get" commands to the ADC device platforms to acquire characteristics and statistics, as well as configure the ADC devices contained on an ADC device platforms. See Hunt, column 8, line 61 to column 9, line 50 and column 14, lines 26 to column 17, line 13.

Differences Between the Applicants' Claims and the Cited Art

The MPEP at § 2131 states:

"'A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.'" The MPEP quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Representative claim 1 recites:

1. In a computerized device, a method for administering software storage area network management modules that operate as part of a storage area network management software application, the method comprising the steps of:

operating a module server to service a plurality of different storage area network management modules that each provide a respective type of management functionality for elements operating within a storage area network associated with the computerized device, the module server lacking administration capability of the plurality of different storage area network management modules;

operating an administration module in conjunction with the module server, the ***administration module providing*** a plurality of ***module administration interfaces that can be remotely invoked to administer*** the plurality of different ***storage area network management modules***;

receiving a remote invocation of at least one of the plurality of module administration interfaces to remotely administer at least one of the storage area network management modules serviced by the module server; and

applying module administration functionality associated with the at least one remotely invoked module administration interface to remotely administer at least one of the storage area network management modules serviced by the module server.

The Applicants respectfully submit that Hunt fails to describe either implicitly or explicitly the Applicants' claimed ***administration module providing... module administration interfaces that can be remotely invoked to administer... storage area network management modules***. In the Office Action, the Examiner seems to indicate that this aspect of the Applicants' claims is taught by Hunt's system management architecture which uses Java applets as a user interface and SNMP to communicate configuration and control requests to ADC device platforms, described in Hunt at column 4, lines 24-30. The Applicants respectfully disagree.

First, Hunt's ADC device platforms are not the same as the Applicants' claimed storage area network management modules. Hunt's ADC platforms are geared towards

managing ADC devices that are used to acquire the data by reading bar codes, magnetic tape and the like that are read by the devices. The Applicants' claimed storage area network management modules, on the other hand, are modules, such as software modules, that provide management functionality for elements operating within a storage area network. These elements may include hosts, switches and storage devices in the storage area network. See Applicants' Application, page 7, lines 24-27.

Nowhere does Hunt teach or suggest that the ADC devices are elements in a storage area network. Moreover, Hunt provides no teaching or suggestion that the ADC device platforms can provide management functionality for elements operating within a storage area network. At best, Hunt's ADC device platforms can manage ADC devices. Managing ADC devices is quite different than managing elements operating in a storage area network. Thus, Hunt's ADC device platforms are not the same as the Applicants' claimed storage area network management modules.

Second, as noted above, Hunt's system management architecture uses Java applets which run on a browser at a remote computer system and issue various SNMP "set" and "get" commands to the ADC device platforms to acquire characteristics and statistics, and configure ADC devices contained on an ADC device platform.

The Applicants, on the other hand, claim an administration module that provides interfaces for administering storage area network management modules. Hunt provides no teaching or suggestion that its Java applets may be used to administer storage area network modules. This is because Hunt's Java applets are geared towards managing ADC devices which as noted above are not the same thing as storage area network management modules. In addition, administering storage area network management modules may include installing, deploying, deinstalling or un-deploying the modules. See Applicants' Application, page 14, lines 25-30. Nowhere does Hunt teach or suggest that the system management architecture can install, deploy, deinstall or un-deploy modules.

Thus, Hunt fails to describe either explicitly or inherently the Applicants' claimed ***administration module providing... module administration interfaces that can be remotely invoked to administer... storage area network management modules***.

With regards to claim 2, Hunt provides no teaching or suggestion of the Applicants' claimed ***installation interface having associated module administration functionality allowing remote installation and removal of storage area network management modules operating in a storage area network management application***. The Examiner seems to indicate that this aspect of the Applicants' claims is disclosed by Hunt at column 20, lines 28-45 and column 21, lines 15-20. The Applicants respectfully disagree.

At column 20, lines 28-45 Hunt merely describes a register interface and an unregister interface that an SNMP subagent calls to register and unregister, respectively, with an SNMP master agent. Registering with the SNMP master agent simply causes the SNMP master agent to forward SNMP requests to the subagent. Likewise, unregistering with the SNMP master agent simply causes the SNMP master agent to no longer forward SNMP requests to the subagent. See Hunt, column 20, lines 54-55 and column 20, lines 47-50.

At column 21, lines 15-20, Hunt merely mentions that a system management support unit provides a Trivial File Transfer Protocol (TFTP) client, application installation utility, file system utility, system upgrade utility and a backup/restore utility, however, Hunt provides no additional details as to what these entities do or how they are used. Certainly, Hunt provides no teaching or suggestion that these entities are used to ***install and remove storage area network management modules in a storage area network management application***.

The Applicants', on the other hand, claim an ***installation interface having associated module administration functionality allowing remote installation and removal of storage area network management modules operating in a storage area network management application***. The installation interface allows storage area network management modules to be installed or removed from a storage area network management application.

Installation relates to the installation of a module to make the module operational. Making the module operational allows the module, for example, to manage elements in a storage area network. The installation may include identifying module metadata that

indicates operational attributes associated with the module to be installed, identifying modules files to be installed for operation of the module, installing the module files and configuring the operational attributes to allow operation of the module to management elements in the storage area network. See Applicants' Application, page 20, line 30 to page 22, line 14 and FIG. 4.

Removal relates to un-installing or un-deploying an installed module to make the module no longer operational. Un-installing and un-deploying may include deleting the installed module as well as deleting all files associated with the module. See Applicants' Application, page 22, line 15 to page 23, line 24 and FIG. 5.

As can be seen, the Applicants' claimed installation interface is quite different from Hunt's register/unregister interface and Hunt's system management support unit. Hunt provides no teaching or suggestion that either the register/unregister interface or the management support unit actually installs modules operating in a network management application to make the modules operational. At best, Hunt mentions an application installation utility but provides no further details as to what this utility does let alone whether this utility is involved in the installation of ***storage area network management modules operating in a storage area network management application*** as claimed by the Applicants. Likewise, Hunt provides no teaching or suggestion that either the register/unregister interface or the management support unit removes modules operating in a network management application to make the modules no longer operational. At best, Hunt describes an unregister interface that merely causes the SNMP master agent to no longer forward SNMP requests to the subagent. However, Hunt provides no teaching or suggestion that calling the unregister interface actually causes the subagent to be removed.

For reasons set forth above, the Applicants respectfully submit that Hunt does not render the Applicants' claims 1-28 anticipated under § 102. Therefore, the Applicants respectfully request that the above rejections to claims 1-28 be withdrawn.

CONCLUSION

In view of the above, it is believed that all claims are in condition for allowance, and it is respectively requested that the Application be passed to issue. If the Examiner believes that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,

Michael J. Badzinski, Esq.
Attorney for Applicant(s)
Registration No.: 51,425
Chapin Intellectual Property Law, LLC
Westborough Office Park
1700 West Park Drive
Westborough, Massachusetts 01581
Telephone: (508) 616-9660
Facsimile: (508) 616-9661

Attorney Docket No.: EMC03-03(03035)

Dated: February 12, 2007

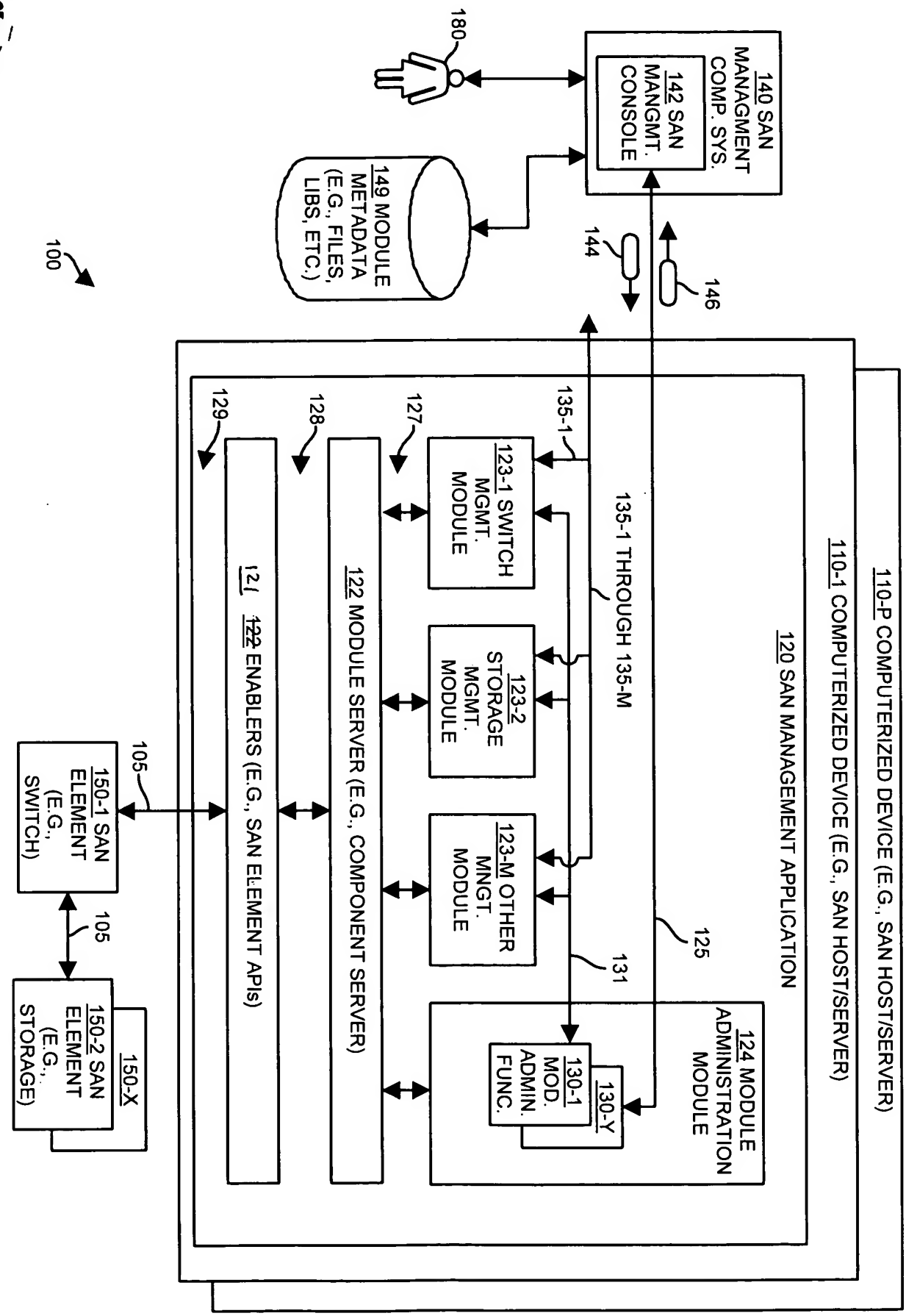

FIG. 1

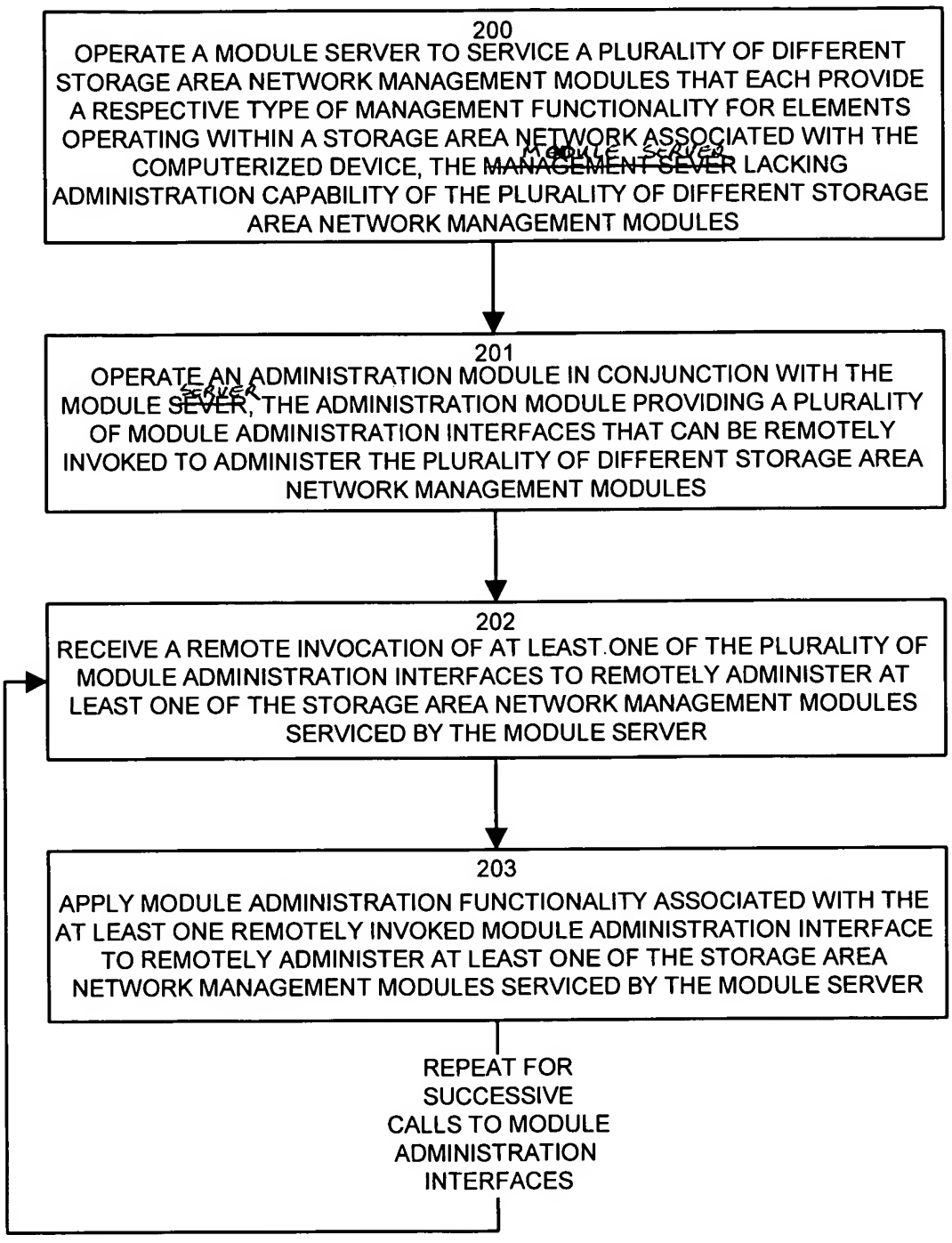
200
OPERATE A MODULE SERVER TO SERVICE A PLURALITY OF DIFFERENT STORAGE AREA NETWORK MANAGEMENT MODULES THAT EACH PROVIDE A RESPECTIVE TYPE OF MANAGEMENT FUNCTIONALITY FOR ELEMENTS OPERATING WITHIN A STORAGE AREA NETWORK ASSOCIATED WITH THE COMPUTERIZED DEVICE, THE MANAGEMENT SEVER LACKING ADMINISTRATION CAPABILITY OF THE PLURALITY OF DIFFERENT STORAGE AREA NETWORK MANAGEMENT MODULES
201
OPERATE AN ADMINISTRATION MODULE IN CONJUNCTION WITH THE MODULE SEVER, THE ADMINISTRATION MODULE PROVIDING A PLURALITY OF MODULE ADMINISTRATION INTERFACES THAT CAN BE REMOTELY INVOKED TO ADMINISTER THE PLURALITY OF DIFFERENT STORAGE AREA NETWORK MANAGEMENT MODULES
202
RECEIVE A REMOTE INVOCATION OF AT LEAST ONE OF THE PLURALITY OF MODULE ADMINISTRATION INTERFACES TO REMOTELY ADMINISTER AT LEAST ONE OF THE STORAGE AREA NETWORK MANAGEMENT MODULES SERVICED BY THE MODULE SERVER
203
APPLY MODULE ADMINISTRATION FUNCTIONALITY ASSOCIATED WITH THE AT LEAST ONE REMOTELY INVOKED MODULE ADMINISTRATION INTERFACE TO REMOTELY ADMINISTER AT LEAST ONE OF THE STORAGE AREA NETWORK MANAGEMENT MODULES SERVICED BY THE MODULE SERVER
REPEAT FOR SUCCESSIVE CALLS TO MODULE ADMINISTRATION INTERFACES

FIG. 2